



UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

DANIEL E. DOW,

Plaintiff

vs.

BANK OF AMERICA CORPORATION
[BoA] and David Leitch in his capacity of
General Counsel ~ PRLAP INC. / Prlap Inc
"Quality Loan Svc Corp | WA state"; and
FEDERAL NATIONAL MORTGAGE
ASSOC and Timothy J. Mayopoulous in his
capacity of General Counsel [FNMA]; and
BLANK ROME LLP and Thomas Cialino
in his capacity as BoA Legal Counsel; and
KYANITE Financial Bus Svs Inc / Seterus-
LD Huffman, KB Pollock, Michael Bryan,
Government Relations; *ET AL*,

Defendants

CASE No. 3:16-cv-05235 RBL

COMPLAINT

1. Quasi In Rem | Quiet Title,
28 U.S. Code § 2409a | RCW 7.28
3. 42 US U.S.C. § C § 1983 Violations,
Damages, Equitable Relief; and
4. 42 U.S.C. § 1988 COSTS and Attorney
Fees; and
5. 28 U.S.C. §1961 et. seq. (See 18 U.S.C.
§§ 1964 (a) and (c) ["Civil RICO"]
6. Washington's "Little RICO"
RCW 9A 82.100(2), and
7. Violating right to privacy RCW 9.73.060

JURY TRIAL IS DEMANDED

Parties to this Complaint

A] **DANIEL E. DOW**, 631 So Goble Creek Rd., Kelso, WA 98626-8913, T 360-747-0778,
jstewart52008@gmail.com, Plaintiff ~ (Defendant); and;

B] **BANK OF AMERICA CORPORATION** [BoA] and DAVID LEITCH in his
capacity of Global General Counsel, 214 North Tyron St, Charlotte, N.C. 28255, T 877-
471-4367, F 302-655-5049; and, PRLAP INC., 401 N. Tyron St., Charlotte, NC 28202-2196
~ Prlap, Inc. "Quality Loan Service Corp. of Washington", 108 1ST Ave., So., #202, Seattle,
WA 98104, T 866-925-0241, F 206-257-3163, Defendants, and;

C] **BLANK ROME LLP** and Thomas P. Cialino in his capacity as Legal Counsel to BoA ||
SETERUS, One Logan Square, 130 N. 18 St., Philadelphia, PA 19103, T 215-569-5668,
F 215-832-5668, TCialino@BlankRome.com, Defendants and;

Complaint Parties (con't)

D) FEDERAL NATIONAL MORTGAGE ASSOCIATION [FNMA] and TIMOTHY J. MAYOPOULOUS in his capacity of General Counsel (former BoA General Counsel 3900 Wisconsin Ave., NW, Washington, DC 20016, T 202-752-7000, Defendants; and,

E) KYANITE FINANCIAL BUS SVCS INC | SETERUS, INC. and LD Huffman and KB Pollock in their capacities as Dir-SrVP | SrVP, and Michael Bryan in his capacity of Gov Affairs | 3039 Cornwallis Rd., Bldg#203, #CC133, #AA145 Research, Triangle Park, NC 27709 | 145 SW Millikan Way, Suite 200, Beaverton, OR 97005, and 758 Rainbow Rd, Windsor, CT 06095, T 866-570-5277, Defendants.

Jurisdiction

11 U.S.C. §§ 727, U.S. Bankruptcy No. 12-44670-BDL, W-dist WA state (10/11/2012); Claim \$75K is far exceeded; Diversity (Defendants from different states), RICO; *Et cetera*.

Statement of Claim

Honorable Robert S. Lasnik, Case #C13-0602RSL, United States District Court [USDC] in the Western District [Seattle], Washington state, Leticia Lucero vs. CENLAR FSB (servicer) proves the Court must cure the serious problems with “servicers”, *ET AL*. RICO *via* alleged banks began early in the U.S.A. (1897 | 1913)!? *Fortune Magazine’s* feature story in 1933, was about how the United States of America’s first banking disaster prodigiously happened as controlled intention. In 2015, (December), Congressman (OR) Peter DeFazio, exposed *the man behind the curtain | the emperor has no clothes*, *via* courageously demanding the Federal Reserve System [Fed/FED] *makes money out of nothing* fund to/for the Average American, transportation infrastructure. My home (*subject property*), 631 So. Goble Creek Rd., Kelso, WA 98626, protected *via* bankruptcy (acknowledged *via* Seterus, *et al*), but despite the Court’s authority, continue to violate my Constitutional Rights and RICO *via* the industry that has failed our United States. Seterus *wrote*: *Bank of America* the original *lender transferred loan servicing to Seterus .. owner of the loan, Federal National Mortgage*

Statement of Claim (con't)

Association [FNMA] participated in the origination of this loan .. owner of the loan is Fannie Mae (Federal National Mortgage Association) .. Fannie Mae has contracted with Seterus to service and respond to inquiries about the loan .. originally Bank of America or anyone who takes over servicing of the loan when the Note is transferred .. Your name and mailing address are listed on both the Note and Deed of Trust governing this loan .. The signature on these documents serves as your **acknowledgement** acknowledgment of the terms and conditions stated ..." (Feb 17, 2016, letter from Michael Bryan, Consumer and Government Affairs, Seterus, Inc.). IT IS TRAGIC that the alleged money lenders must continue in this RICO to fund the "Federal Government"? Time for the Court to join in honoring the Average American as Congress Member DeFazio and Judge Lasnick. *See*, <http://wolfstreet.com/2016/03/11/uncle-sams-largest-asset-student-loans-haunt-us-for-years/> Please also see, *Assets and Liabilities ... And "Debt Saturation", by Bill Holter, 03/19/16*, <http://www.globalresearch.ca/assets-and-liabilities-and-debt-saturation/5514288>.

Relief:

- [1] ORIGINAL PROMISSORY NOTE (CERTIFIED COPY), IN THE COURT;
- [2] DERIVATIVES/ SECURITIZATION/ MONETIZATION/ *et al* FULLY DISCLOSED;
- [3] REMOVAL ANY-ALL FRAUDULENT TITLE CLOUDS;
- [4] RICO CEASE-DESIST-STOP *via paper terrorism ~ financial terrorism, et al, etc*;
- [5] TREBLE DAMAGES CALCULATED *via* DEFENDANTS' UNJUST ENRICHMENT;
- [6] COURT DISCRETION RE: **WHOLE CONTRACT FRAUD**.

Respectfully this day, March 25, 2016.



DANIEL E. DOW